UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

APR 07 2014

Mr. Raymond Kim
Hawkins Parnell,
Thackston & Young LLP
445 South Figueroa, Suite 3200
Los Angeles, California 90071

Re: Freedom of Information Act Request EPA-R9-2014-004341

Dear Mr. Kim:

This letter is in response to your Freedom of Information Act (FOIA) request regarding the Boeing Company, located at 2201 Seal Beach Blvd., Building 80, Sea Beach, California.

I am enclosing a copy of the records which are responsive to y our request.

Pursuant to 40 C.F.R. Section 2.120 (a)(5)(iii), there will be no fee charged for providing the enclosed information.

If you have any questions, please contact Maureen Kyllonen at (415) 972-3314.

Sincerely,

Amy C. Miller, Deputy Director
Enforcement Division

Enclosure

BC: Dan

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 10,2001

Certified Mail No. 70001670000931230865
Return Receipt Requested

In reply, refer to WST-3-1

TRANSMITTAL LETTER

Theresa J. Boehm
Environmental Manager
The Boeing Company
P.O.Box 2515
Seal Beach, CA 91740

Dear Mrs. Boehm:

On November 11, 2000, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency ("EPA") at the Boeing Company, located in Seal Beach, California, U.S. EPA Identification Number CAD 057 782 989. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with Title 22 Code of California Regulations ("CCR"), Division 4.5. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations.

By copy of this letter, EPA is providing the State of California with notice of the referenced violations of Title 22 CCR, Division 4.5. The State of California may notify EPA of its intent to assume or decline responsibility to take appropriate action to resolve the referenced violations.

EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fourteen (14) calendar days from the date of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this letter shall be mailed to:

Daniel Fernandez
Mailcode: WST-3-1
RCRA Enforcement Section
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter, please contact Daniel Fernandez at (415) 744-2146.

Sincerely,

Frances C. Schultz, Chief
RCRA Enforcement Section

cc w/enclosure: Stephen Lavinger, DTSC, Cal-EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT SECTION
RCRA COMPLIANCE EVALUATION REPORT

Purpose:	RCRA Compliance Evaluation Inspection
Facility:	The Boeing Company
Facility Location:	2201 Seal Beach Blvd. Seal Beach, CA 91740
Facility Mailing Address:	P.O.Box 2515 Seal Beach, CA 91740
EPA ID Number:	CAD 057 782 989
Date of Investigation:	November 11, 2000
EPA Representatives:	Daniel Fernandez (415) 744-2146
Orange County Environmental Regulatory Program Representative:	James R. Hendron (714) 667-3708
Facility Representatives:	Theresa J. Boehm Environmental Manager (562) 797-4916
Report Prepared By:	Daniel Fernandez
Date of Report:	December 20, 2000

INVESTIGATION

The purpose of the investigation was to determine the facility's compliance with the applicable federal environmental statutes and regulations, and in particular the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), chapter 40, Parts 261-265, 268 and 279, and the California Code of Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20.

On November 11, 2000, James R. Hendron, representing the Orange County Environmental Regulatory Program, and Dan Fernandez, representing the U.S. Environmental Protection Agency (EPA), conducted an unannounced site investigation at The Boeing Company. ("Boeing" or "the facility") EPA ID# CAD 057 782 987, located at 2201 Seal Beach Blvd., CA 91740. Upon providing introductions and credentials, the inspectors contacted Mrs. Boehm, Environmental Manager. The inspectors explained that this was a routine inspection to determine whether or not the facility was in compliance with the federal and state regulations concerning the proper management of RCRA hazardous wastes. The inspection would consist of a walk-through of those areas of the facility where hazardous waste and used oil were handled, followed by a record review. In the course of the pre-briefing, the inspectors provided Boeing representatives with a copy of the Small Business Regulatory Enforcement Fairness Act (SBREFA) Information Sheet.

BACKGROUND

The Boeing Company has been at this location since 1996 when it was purchased from Rockwell Corporation. The facility employs 2,700 full-time personnel and encompasses 100 acres. This facility builds, tests and assembles communication satellites. Boeing also conducts research and product development at this facility.

The facility first notified EPA of hazardous waste generation on December of 1996, as a large quantity generator (LQG). The facility re-notified on November of 1999, changing their name and status as small quantity generator (SQG). The manufacturing of the satellite communication equipment and research takes place in three buildings, where most of the hazardous waste is generated.

Manufacturing Process

The manufacturing of antennas, communication boards and satellite frames take place in buildings 84, 85, 86 and 100. Manufacturing is conducted on a small scale, since the parts are made one at the time and required a high degree of precision. These manufactured parts are later assembled onto a satellite and tested. The satellite parts are tested in conditions that resemble the exact conditions in space. Some of the tests include extreme temperatures, vibration, and interference.

The wastes generated from the manufacturing process are solvents, empty aerosol cans, wipes contaminated with solvents, oily rags, used oil, steel, aluminum and small amounts of copper. According to the facility's representative, the hazardous waste generated is handled by Romic Environmental of Chandler, Arizona.

According to the facility representative, no Biennial Report was filed for 1999 since they are a Small Quantity Generator (SQG). A review of their manifests supported the SQG classification. A Compliance Evaluation Investigation (CEI) was conducted by the Orange County Environmental Regulatory Program on April 6, 2000 (Attachment # 1). No violations were noted during the CEI.

WALK-THROUGH INSPECTION

Building # 84

This building is where the Engineering and Development laboratories are located. Here electronic components are assembled and tested. The building had three rooms with satellite accumulation areas (SAAs).

Room 160 (Electronics) had a SAA with one 10-gallon container holding lead waste. No violations were noted.

Room 159 (Engineering) had a SAA with one 10-gallon container holding lead waste. No violations were noted.

Room 119 (Antenna Developing Lab) had a SAA with one empty 10-gallon container. No violations were noted.

Building # 100

This building had a machine and metal workshop. The wastes generated in this area include used oil, metal shavings, empty aerosol paint cans, oily rags and rags contaminated with solvents. At the time of the inspection, there was no work being performed. However, the area had a SAA with one 10-gallon container holding contaminated rags with alcohol. No violations were noted.

Building # 91

This area is where the satellite's electronics and communication equipment is tested. The equipment to be tested is attached to a Solar Bus (a replica of one in outer space), which moves and creates conditions similar to the ones in space. The equipment is subjected to space inertia, high fidelity disturbances, control simulation and other types of interference.

The area had two 10-gallon containers. One container was empty and the other held contaminated rags with alcohol. No violations were noted.

Building # 86

This building is where integration and equipment takes place. The building had a manufacturing machine shop, which is used to fix and modify parts to fit the equipment attached to the air buss. The waste generated from this process includes used oil and metal shavings. The area also had a paint booth which was not in use.

At the time of the inspection, no work was being performed. The SAA had a 10-gallon container that was empty. No violations were noted.

Building # 85

This building is connected to building #86 and the work is shared between them. Building #85 (Environmental Test Area) is where the electronic equipment is tested to withstand the environmental conditions encountered in space. The electronic equipment is assembled onto a Solar-Bus and then put into a vacuum chamber. In the vacuum chamber, the Solar-Bus is subjected to zero gravity and temperatures ranging from 20 to 200 degrees Celsius.

The area had a SAA with a 10-gallon container holding contaminated rags with solvents. No violations were noted.

Building # 86 (Outside)

This area had a SAA with one 55-gallon container holding used oil. Also, within five feet, there was an air compressor which generated small amounts of oil. The compressor had a two-gallon container attached collecting waste oil.

At the time of the inspection, it was noted that the 55-gallon container was not labeled with the words "used oil" and it was open (see Photograph # 1). Also, the two-gallon container holding used oil was not labeled with the words "used oil," the words "hazardous waste," the accumulation start date, the name of the generator, the particular hazardous properties of the waste, nor the composition and physical state of the waste (see Photograph # 2).

Building # 80 Shipping Dock

This area had a SAA with one 55-gallon container holding polychlorinated biphenyls (PCBs). No violations were noted.

90-Day Storage Area

This area had two 55-gallon containers holding PCBs and one 5-pound bag holding contaminated towels. The 5-pound bag was labeled as towels with traces of acetone and "methyl-ethyl." No violations were noted.

RECORDS REVIEWED

-Land Disposal Restriction Notification Forms for 1998, 1999 and 2000.
No violations were noted.

-Manifests for 1998, 1999 and 2000
No violations were noted.

-Training Records
The records were mailed to EPA on 12/8/00. No violations were noted.

POTENTIAL VIOLATIONS FOR
CALIFORNIA REGULATED, NON-RCRA HAZARDOUS WASTE

1. Failure to label containers

22 CCR §66279.21(b)

Containers and above ground tanks used to store used oil and fill pipes used to transfer used oil into underground storage tanks shall be marked or clearly labeled with the words "Used Oil."

Building #86 outside SAA: The facility failed to label a 55-gallon container holding waste oil with the words "Used Oil."

Building #86 outside SAA: The facility failed to label the two-gallon container attached to the air pump unit with the words "Used Oil."

Action taken by the facility: The facility corrected the violation by re-labeling the 55-gallon container during the inspection. <u>However, the two-gallon container was not re-labeled.</u>

2. Failure to label containers

22 CCR §66262.34(e)(1)(E)

A generator may accumulate as much as 55-gallons of hazardous waste in a container at or near the point of generation, provided he complies with subsection (f).

§66262.34(f)(1) states that each container and tank used for onsite accumulation of hazardous waste, shall be clearly marked with the date upon which each period of accumulation begins.

§66262.34(f)(3) each container and tank used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words "hazardous waste." Additionally, all containers shall be labeled with the following information:

§66262.34(f)(3)(A) states that each container and tank used for onsite accumulation of hazardous waste shall have the composition and physical state of the waste;

§66262.34(f)(3)(B) states that each container and tank used for onsite accumulation of hazardous waste shall have a statement which calls attention to the particular hazardous properties of the waste.

Building #86 outside SAA: The facility failed to label the two-gallon container attached to the air pump unit with the above information.

3. Failure to close a container

22 CCR §66262.34(e)(1)(D)

A generator may accumulate as much as 55-gallons of hazardous waste , one quart of acutely hazardous waste or one quart of extremely hazardous waste at or near any point of generation, without a permit or grant of interim status if it complies with 22 CCR §66265.173(a).

Building #86 outside SAA: The facility failed to close the 55-gallon container holding used oil.

Action taken by the facility: The facility corrected the violation by closing the container during the inspection.

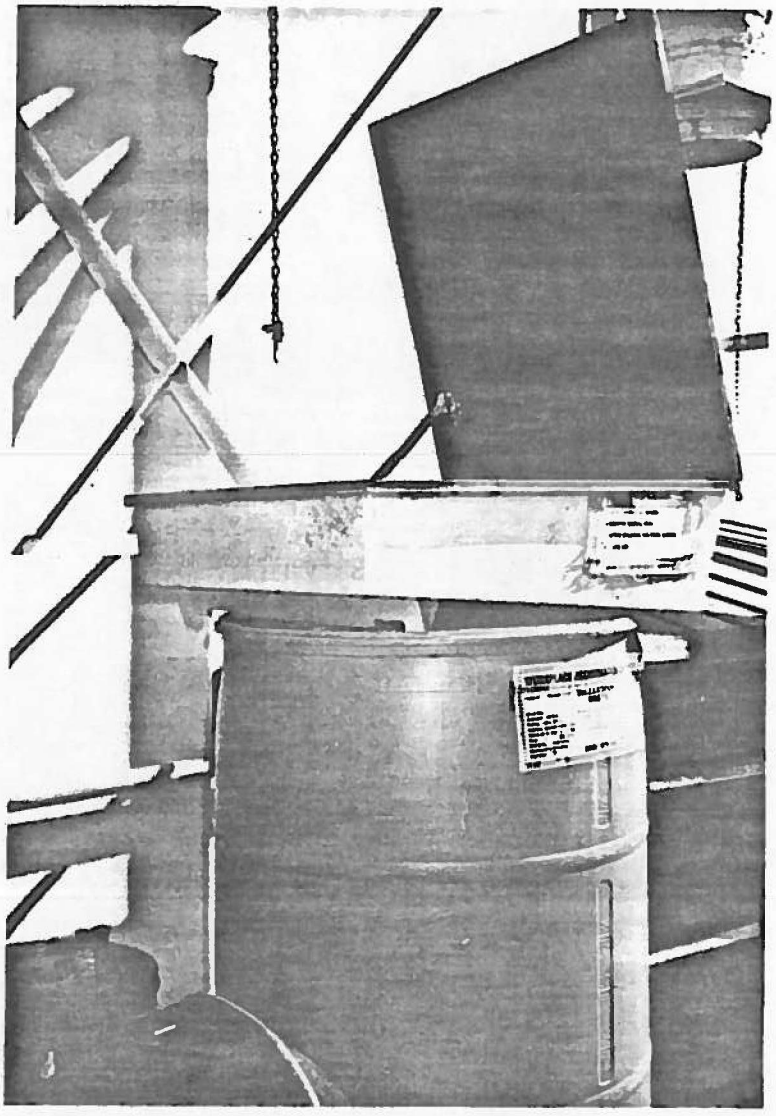
ATTACHMENT

Photograph

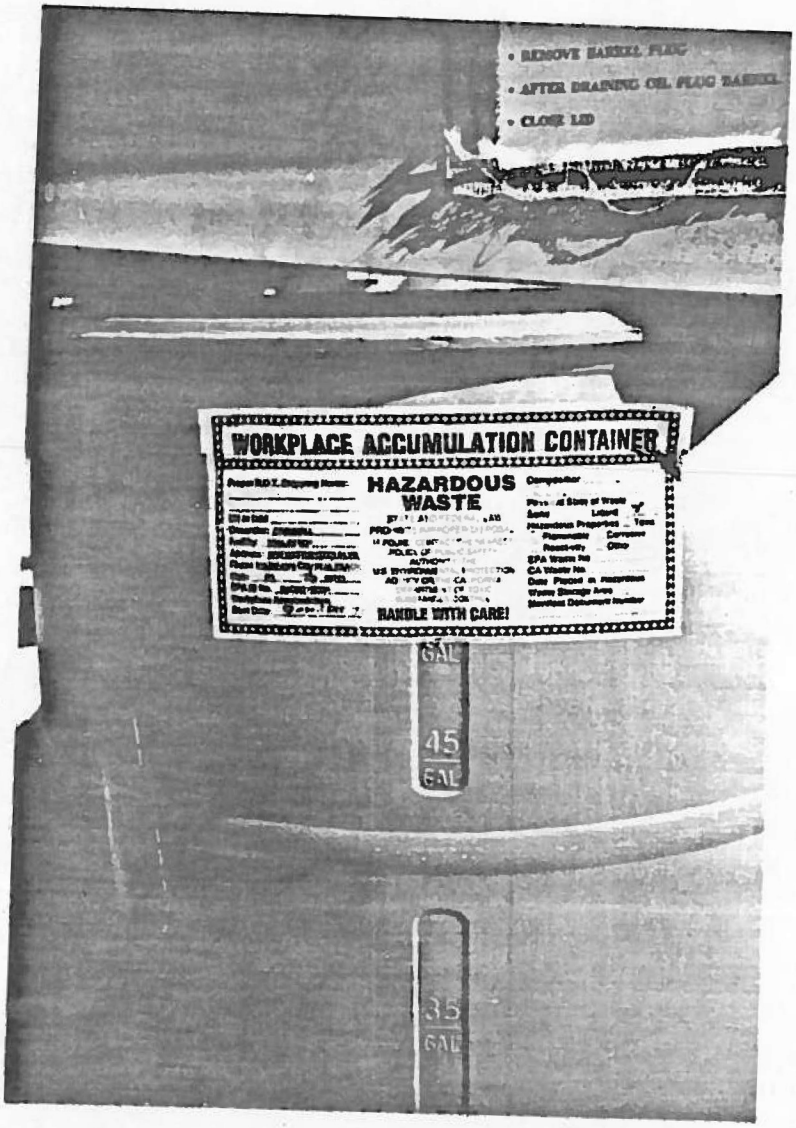
1. Orange County Environmental Regulatory Program CEI Report.

2. Boeing Company Submitted Documentation.

Photographs

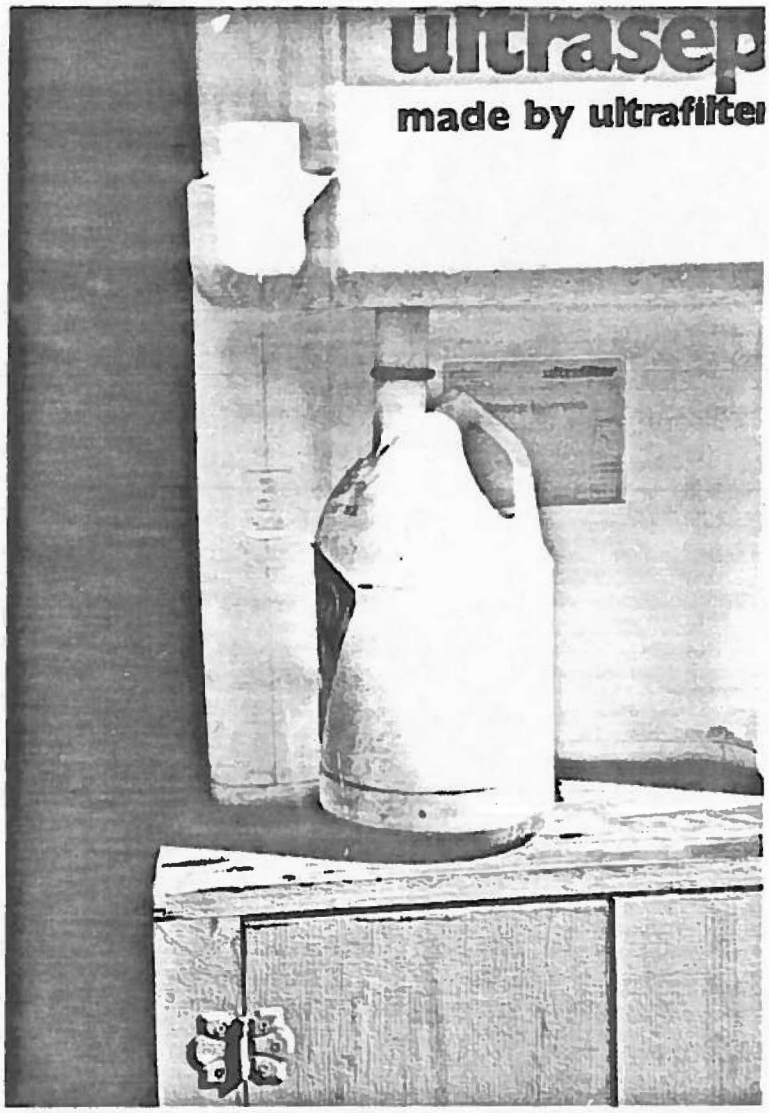


Photograph # 1 Building # 86 (Outside SAA): Open 55-gallon container holding used oil.



Photograph # 2

Building # 86 (Outside SAA): 55-gallon container not labeled with the words "Used Oil."



Photograph # 3

Building # 86 (Outside SAA): Two gallon container holding used oil not labeled with the words "used oil," the words "hazardous waste," the accumulation start date, the name of the generator, the particular hazardous properties of the waste, nor the composition and physical state of the waste.

Attachment # 1

COUNTY OF ORANGE
HEALTH CARE AGENCY

REGULATORY HEALTH SERVICES
ENVIRONMENTAL HEALTH

JULIETTE A. POULSON, RN, MN
INTERIM DIRECTOR

MIKE SPURGEON
DEPUTY AGENCY DIRECTOR
REGULATORY HEALTH SERVICES

STEVEN WONG, REHS, MPH
INTERIM DIRECTOR
ENVIRONMENTAL HEALTH

MAILING ADDRESS:
2009 EAST EDINGER AVENUE
SANTA ANA, CA 92705-4720

TELEPHONE: (714) 667-3600
1st FLOOR FAX: (714) 972-0749
2nd FLOOR FAX: (714) 568-5116
E-MAIL: environhealth@hca.co.orange.ca.us

FAX TO THE FOLLOWING NUMBER: (415) 744-1044

THE FOLLOWING PAGES ARE FOR:

Name of Individual: Daniel Fernandez

Telephone Number: 744-2146

Firm Name: USEPA

Documents Transmitted: Boeing inspection report

Comments:

From: J R Henderson 714 667-3708
HCA/Environmental Health Telephone No.

TOTAL NUMBER OF PAGES:

This Information Sheet plus 7 **Page(s)**

Date Sent: 1-11-01 **Time Sent:** 9:00 **a.m./p.m.(circle one)**

If you do not receive all the pages, please call (714) 667-3706 as soon as possible to request a retransmission.

FAX Operator:

Rev: 12/1/99

Orange County Health Care Agency
Environmental Health Division, Hazardous Materials Management Section
Office: 2009 E. Edinger, Santa Ana, CA 92705
Telephone: (714) 667-3600

HAZARDOUS WASTE, UNDERGROUND STORAGE TANK, TIERED PERMITS INSPECTION REPORT

FILE NO: 005284 ACCOUNT NO: 17804 EPA# : CAD057782989
FACILITY: THE BOEING COMPANY UST PERMIT NO: 17804-1
STREET: 2201 SEAL BEACH BLVD BLDG# STE# PERMIT: 12/06/98 - 12/05/2001
CITY: SEAL BEACH ZIP: 90740 MAP COORDINATES: 826-G3
CITY CODE:[21] SEAL BEACH DISTRICT: 303
NEAREST CROSS STREET: WESTMINSTER
NEW DBA? ___ NEW BUSINESS? ___ NEW ADDRESS? ___ NEW OWNER? ___ PUBLIC AGENCY? ___
NEW INFO: _____
HW INSPECTION TYPE: 1 NO OF UST ON SITE: 3 UST INSPECTION TYPE: 1
TIERED PERMIT INSPECTION TYPE: ___
NUMBER OF EMPLOYEES: 25 N # TANKS TO BILL :3 UST COMPLIANCE CODE: 2
LAST HW ROUTINE INSPECTION: 04-01-99 LAST UST ROUTINE INSPECTION: 04-01-99
HW EXEMPT CODE: 1 UST EXEMPT CODE: 1
HW STATUS CODE: 1 UST STATUS CODE: 1
TIERED PERMIT EXEMPT CODE: TIERED PERMIT STATUS CODE:
CP NOTIFICATION FILED (Y/N)? ___ HHWCF ___
BUSINESS OWNER: ~~BOEING NORTH AMERICAN INC~~ The Boeing Company PHONE: (562) 797-4916
TANK OPERATOR: THERESA BOEHM PHONE: (562) 797-4916
CONTACT: THERESA BOEHM PHONE: (562) 797-4916

HW BILLING (NAME & MAILING ADDRESS):
~~BOEING NORTH AMERICAN INC~~ The Boeing Company
P O BOX 2515
ATTN: THERESA BOEHM, ~~HB186~~, SE99
SEAL BEACH CA 90740-151
PHONE: (562) 797-4916

UST BILLING (NAME & MAILING ADDRESS):
~~BOEING NORTH AMERICAN INC~~ The Boeing Company
P O BOX 2515
ATTN: THERESA BOEHM, ~~HB186~~, SE99
SEAL BEACH CA 90740-151
PHONE: (562) 797-4916

PROPERTY OWNER (NAME & MAILING ADDRESS):
~~BOEING NORTH AMERICAN INC~~ The Boeing Company
2201 SEAL BEACH BLVD
SEAL BEACH CA 90740-151
PHONE: (562) 797-4916

TANK OWNER (NAME & MAILING ADDRESS):
~~BOEING NORTH AMERICAN INC~~ The Boeing Company
P O BOX 2515
ATTN: THERESA BOEHM, ~~HB-186~~, SE 99
SEAL BEACH CA 90740-151
PHONE: (562) 797-4916

EMERGENCY CONTACTS
DAY: THERESA BOEHM PHONE: (562) 797-4916

ACTIVE ICR: 98TI74
INSPECTOR #: 202 NAME: Patti Quackenbush DATE: 4,6,00
Run Date: 01-20-00 HW CNTR: 5 UST CNTR: 21 TP CNTR:1 PAGE 1 OF ___

ENTERED APR 17 2000

Orange County Health Care Agency
HAZARDOUS WASTE INSPECTION REPORT

DBA: THE BOEING COMPANY
DDRESS: 2201 SEAL BEACH BLVD BLDG# STE#
: SEAL BEACH, CA 90740
ITY CODE:[21] SEAL BEACH

ILE NO: 005284 ACCOUNT NO: 17804 EPA# : CAD057782989
ROCESS: PHOTODEVELOPING - MICROFILM DEVELOPING WAITING FOR NEW CONTRACT.
MFR SATELLITE. OCCASIONAL WASTES FROM CLEAN UP OR FACILITY
WALK-THROUGHS. GO TO GATE 510 NEAR BLDG 84

SIC CODE 1: [3669] COMMUNICATIONS EQUIPMENT, NEC
SIC CODE 2: [3600] ELECTRONIC & OTHER ELECTRIC

now Digital Process 3-00

WASTE ID: [2082.W] FIX (PHOTO WASTE)
SPECIFIC WASTE: BUILDING #81 DATA SERVICES
LOCATION: ISC MICROFILM & GRAPHICS PHOTO
MAX VOL STORED: 200 UNIT: [1] GALLONS FORM: [2] LIQUID
HOW STORED: [6] DRUM (55G-PLASTIC ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: 50 ANNUAL VOL. DISPOS.: 50
HOW DISPOS.: [79] RECYCLED OFF-SITE - OTHER-INSIDE CA
HAULER: [1599] T S M RECOVERY/RECYCLING

0 WASTE ID: [2070.W] ==WASTE (OR SLOP) OIL (T)
SPECIFIC WASTE: FROM ANNUAL PREVENTIVE MAINTENANCE OF EQUIP
LOCATION: STORAGE AREA
MAX VOL STORED: 50 UNIT: [1] GALLONS FORM: [2] LIQUID
HOW STORED: [1] DRUM)= 55G-METAL ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: ~~270~~ 350 ANNUAL VOL. DISPOS.: ~~270~~ 350
HOW DISPOS.: [79] RECYCLED OFF-SITE - OTHER-INSIDE CA
HAULER: [160] ROMIC CHEMICAL CORPORATION

2 WASTE ID: [2085.W] == SOLVENTS - HALOGENATED
SPECIFIC WASTE: SMALL AMOUNT TCA, MEK, (1,1,1) MIXED W/OIL
LOCATION: SMALL AMOUNTS FROM MANUFACTURING
MAX VOL STORED: 80 UNIT: [1] GALLONS FORM: [2] LIQUID
HOW STORED: [1] DRUM)= 55G-METAL ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: 80 ANNUAL VOL. DISPOS.: 80
HOW DISPOS.: [47] INCINERATION OUTSIDE OF CALIF
HAULER: [160] ROMIC CHEMICAL CORPORATION

INSPECTION DATE: 4,6,00 PAGE: 2 OF ___

Orange County Health Care Agency
HAZARDOUS WASTE INSPECTION REPORT

DBA: THE BOEING COMPANY
DDRESS: 2201 SEAL BEACH BLVD BLDG# STE#
: SEAL BEACH, CA 90740
ITY CODE:[21] SEAL BEACH

ILE NO: 005284 ACCOUNT NO: 17804 EPA# : CAD057782989

3 WASTE ID: [2085.W] == SOLVENTS - HALOGENATED
13
SPECIFIC WASTE: FROM MANUFACTURING
LOCATION: STORAGE AREA/RAGS W/THINNER WASTE
MAX VOL STORED: 400 UNIT: [2] POUNDS FORM: [7] WET RAGS
HOW STORED: [1] DRUM >= 55G-METAL ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: 400 ANNUAL VOL. DISPOS.: 400
HOW DISPOS.: [47] INCINERATION OUTSIDE OF CALIF
HAULER: [160] ROMIC CHEMICAL CORPORATION

4 WASTE ID: [2009.W] ASBESTOS WASTE
14
SPECIFIC WASTE: ASBESTOS ABATEMENT ~~(10 YARDS) (30)~~
LOCATION: NONE PRESENTLY STORED
MAX VOL STORED: 40 UNIT: 30 3 Yards ~~POUNDS~~ FORM: [1] SOLID
HOW STORED: [20] BAG - PAPER,CLOTH,PLASTIC ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: ~~4000~~ 21 ANNUAL VOL. DISPOS.: ~~4000~~ 21
HOW DISPOS.: [15] LANDFILL - CLASS I - OTHER OUTSIDE CALIF
HAULER: [1533] ECOLOGY CONTROL INDUSTRIES

5 WASTE ID: [2125.W] ALCOHOL
13
SPECIFIC WASTE: NON-HALOGENATED SOLVENTS
LOCATION: FROM MANUFACTURING
MAX VOL STORED: 55 UNIT: [1] GALLONS FORM: [2] LIQUID
HOW STORED: [1] DRUM >= 55G-METAL ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: 55 ANNUAL VOL. DISPOS.: 55
HOW DISPOS.: [79] RECYCLED OFF-SITE - OTHER-INSIDE CA
HAULER: [68] I T CORPORATION -O

6 WASTE ID: [2112.W] == PAINT / STAIN / THINNER WASTE
16
SPECIFIC WASTE: AEROSOL/CANS
LOCATION: HW STORAGE
MAX VOL STORED: 200 UNIT: [2] POUNDS FORM: [9] LAB PACKED WASTE
HOW STORED: [1] DRUM >= 55G-METAL ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: ~~240~~ 140 ANNUAL VOL. DISPOS.: ~~240~~ 140
HOW DISPOS.: [15] LANDFILL - CLASS I - OTHER OUTSIDE CALIF
HAULER: [160] ROMIC CHEMICAL CORPORATION

INSPECTION DATE: 4/6/00 PAGE: 2 OF ___

Orange County Health Care Agency
HAZARDOUS WASTE INSPECTION REPORT

DBA: THE BOEING COMPANY
DDRESS: 2201 SEAL BEACH BLVD BLDG# STE#
: SEAL BEACH, CA 90740
ITY CODE:[21] SEAL BEACH

ILE NO: 005284 ACCOUNT NO: 17804 EPA# : CAD057782989
7 WASTE ID: [2112.W] == PAINT / STAIN / THINNER WASTE
SPECIFIC WASTE: WATERFALL BOOTH W/FILTERS/SLUDGE RARELY USED
LOCATION: IN BOOTHS
MAX VOL STORED: 110 UNIT: [2] POUNDS FORM: [4] SLUDGE / SLURRY
HOW STORED: [1] DRUM)= 55G-METAL ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: 30 ANNUAL VOL. DISPOS.: 30
HOW DISPOS.: [79] RECYCLED OFF-SITE - OTHER-INSIDE CA
HAULER: [160] ROMIC CHEMICAL CORPORATION

8 WASTE ID: [2118.W] ACID WASTE
SPECIFIC WASTE: POTASSIUM HYDROXIDE, WASTE BATTERIES
LOCATION: HW STORAGE AREA
MAX VOL STORED: 400 UNIT: [2] POUNDS FORM: [1] SOLID
HOW STORED: [1] DRUM)= 55G-METAL ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: ~~655~~ 975 ANNUAL VOL. DISPOS.: ~~655~~ 975
HOW DISPOS.: [79] RECYCLED OFF-SITE - OTHER-INSIDE CA
HAULER: [160] ROMIC CHEMICAL CORPORATION

WASTE ID: [2079.W] == RESIN WASTE
SPECIFIC WASTE: RESIN WASTE (ISOCYANATE RESIN REACTED)
LOCATION: FROM INSULATION/IN STORAGE AREA
MAX VOL STORED: 300 UNIT: [2] POUNDS FORM: [1] SOLID
HOW STORED: [5] DRUM)= 55G-PLASTIC ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: 100 ANNUAL VOL. DISPOS.: 100
HOW DISPOS.: [79] RECYCLED OFF-SITE - OTHER-INSIDE CA
HAULER: [160] ROMIC CHEMICAL CORPORATION

1 WASTE ID: [3.W] ACETONE, PROPANONE
SPECIFIC WASTE: ACETONE W/MEK
LOCATION: FROM MANUFACTURING
MAX VOL STORED: 55 UNIT: [1] GALLONS FORM: [2] LIQUID
HOW STORED: [1] DRUM)= 55G-METAL ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: 55 ANNUAL VOL. DISPOS.: 55
HOW DISPOS.: [79] RECYCLED OFF-SITE - OTHER-INSIDE CA
HAULER: [160] ROMIC CHEMICAL CORPORATION

INSPECTION DATE: 4/6/00 PAGE: 4 OF ___

Orange County Health Care Agency
HAZARDOUS WASTE INSPECTION REPORT

DBA: THE BOEING COMPANY
DDRESS: 2201 SEAL BEACH BLVD BLDG# STE#
: SEAL BEACH, CA 90740
ITY CODE:[21] SEAL BEACH

ILE NO: 005284 ACCOUNT NO: 17804 EPA# : CAD057782989

Z WASTE ID: [2107.W] == DIOXIN / PCBs

SPECIFIC WASTE: PCB BALLASTS
LOCATION: HW STORAGE
MAX VOL STORED: 50 UNIT: [2] POUNDS FORM: [1] SOLID
HOW STORED: [1] DRUM)= 55G-METAL ONE-TIME-ONLY? N
ANNUAL VOL. GEN.: 1700 ANNUAL VOL. DISPOS.: 1700
HOW DISPOS.: [84] TREATMENT OFF-SITE - INSIDE CA
HAULER: [160] ROMIC CHEMICAL CORPORATION

WASTE ID: [ ] ____
SPECIFIC WASTE: ____
LOCATION: ____
MAX VOL STORED: ____ UNIT: [ ] ____ FORM: [ ] ____
HOW STORED: [ ] ____ ONE-TIME-ONLY? ____
ANNUAL VOL. GEN.: ____ ANNUAL VOL.DISPOS.: ____
HOW DISPOS.: [ ] ____
HAULER: [ ] ____

WASTE ID: [ ] ____
SPECIFIC WASTE: ____
LOCATION: ____
MAX VOL STORED: ____ UNIT: [ ] ____ FORM: [ ] ____
HOW STORED: [ ] ____ ONE-TIME-ONLY? ____
ANNUAL VOL. GEN.: ____ ANNUAL VOL.DISPOS.: ____
HOW DISPOS.: [ ] ____
HAULER: [ ] ____

WASTE ID: [ ] ____
SPECIFIC WASTE: ____
LOCATION: ____
MAX VOL STORED: ____ UNIT: [ ] ____ FORM: [ ] ____
HOW STORED: [ ] ____ ONE-TIME-ONLY? ____
ANNUAL VOL. GEN.: ____ ANNUAL VOL.DISPOS.: ____
HOW DISPOS.: [ ] ____
HAULER: [ ] ____

INSPECTION DATE: 4/6/00 PAGE: 5 OF ____

County Health Care Agency
HAZARDOUS WASTE INSPECTION REPORT

DBA: THE BOEING COMPANY
DDRESS: 2201 SEAL BEACH BLVD BLDG# SITE#
: SEAL BEACH, CA 90740
ITY CODE:[21] SEAL BEACH

ILE NO: 005284 ACCOUNT NO: 17804 EPA# : CAD057782989

IOLATION DESCRIPTIONS

ste Determination
___ 601 HAZARDOUS WASTE DETERMINATION NOT MADE FOR ALL WASTE
PA Identification Number
___ 651 GENERATOR HAS NO EPA IDENTIFICATION NUMBER
anifests
___ 652 MANIFESTS NOT ACCURATELY COMPLETED
___ 653 MANIFESTS NOT USED FOR TRANSPORTING HAZARDOUS WASTE
___ 654 COPIES OF MANIFESTS NOT AVAILABLE FOR REVIEW DURING INSPECTION
___ 655 PROPERLY COMPLETED COPIES OF MANIFEST OR EXCEPTION REPORT NOT SUBMITTED TO DTSC
___ 101 MANIFESTS, BIENNIAL REPORT, EXCEPTION REPORTS, TEST RESULTS NOT RETAINED ON-SITE FOR AT LEAST 3 YEARS
on-Registered Hauler
___ 201 HAZARDOUS WASTE TRANSPORTED OFF SITE BY A NON-REGISTERED HAULER
___ 202 HAZARDOUS WASTE NOT TAKEN TO A STATE-PERMITTED FACILITY
xtremely Hazardous Waste
___ 251 EXTREMELY HAZARDOUS WASTE HANDLED OR DISPOSED WITHOUT A PERMIT
raining
___ 301 PERSONNEL NOT TRAINED ON THE JOB OR IN CLASSROOM WITHIN 6 MONTHS OF EMPLOYMENT
___ 302 TRAINING NOT CONDUCTED BY PERSON TRAINED IN HAZARDOUS WASTE MANAGEMENT
___ 303 TRAINING DOES NOT INCLUDE EMERGENCY RESPONSE PROCEDURES AND EMERGENCY EQUIPMENT USE
___ 304 COMPLETE PERSONNEL TRAINING RECORDS ARE NOT BEING MAINTAINED ON-SITE
ontingency Plan
___ 351 GENERATOR HAS NOT PREPARED CONTINGENCY PLAN OR HAS NOT MAINTAINED THE PLAN AT THE SITE
___ 352 CONTINGENCY PLAN DOES NOT INCLUDE ALL REQUIRED INFORMATION
___ 353 EMERGENCY COORDINATOR IS NOT FAMILIAR WITH ALL ASPECTS OF SITE OPERATION AND EMERGENCY PROCEDURES
beling
___ 452 CONTAINERS NOT VISIBLY MARKED WITH THE BEGINNING DATE OF ACCUMULATION
___ 453 EACH CONTAINER AND TANK NOT CLEARLY LABELED "HAZARDOUS WASTE" WITH REQUIRED DETAILS
torage
___ 354 RELEASED WASTE OR CONTAMINATED EQUIPMENT IS NOT PROPERLY TREATED, STORED OR DISPOSED
___ 464 ADEQUATE AISLE SPACE NOT AVAILABLE FOR UNOBSTRUCTED MOVEMENT
___ 451 HAZARDOUS WASTE STORED BEYOND MAXIMUM ACCUMULATION TIME
___ 455 EACH CONTAINER OF 110 GALLONS OR LESS IS NOT PROPERLY LABELED
___ 501 CONTAINERS ARE NOT IN GOOD CONDITION OR ARE NOT MANAGED TO PREVENT LEAKS
___ 502 CONTAINERS ARE NOT COMPATIBLE WITH THE WASTE IN THEM
___ 503 CONTAINERS ARE NOT STORED CLOSED
___ 504 CONTAINERS ARE NOT INSPECTED WEEKLY FOR LEAKS OR DEFECTS
___ 505 IGNITABLE OR REACTIVE WASTES ARE NOT STORED 50 FT. FROM FACILITY PROPERTY LINE
___ 506 INCOMPATIBLES ARE NOT MANAGED/STORED TO PREVENT CONTACT OR MIXING
___ 700 FACILITY NOT MAINTAINED TO MINIMIZE FIRE, EXPLOSION, OR RELEASE OF HAZARDOUS WASTE
losure
___ 800 FACILITY HAS NOT BEEN CLOSED IN A MANNER WHICH WILL PROTECT HUMAN HEALTH AND THE ENVIRONMENT

NSPECTION DATE: 4.6.00

Orange ~~unty Health Care Agency
HAZARD(; WASTE INSPECTION REPORT

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: SEAL BEACH, CA 90740
ITY CODE:[21] SEAL BEACH

ILE NO: 005284 ACCOUNT NO: 17804 EPA# : CAD057782989

iered Permitting

___ 601 FACILITY HAS NOT FILED NOTIFICATION UNDER TIERED PERMITTING

ource Reduction

___ 901 GENERATOR HAS NOT PREPARED A SOURCE REDUCTION EVALUATION REVIEW AND PLAN OR HAS NOT MAINTAINED THE PLAN AT THE SITE

he above noted items represent violations of the California Health and Safety Code, Chapter 6.5, and California Code of Regulations, itle 22, and shall be corrected as indicated

- Employees who handle waste are trained in Haz-Com & equipment operations annually. Reviewed records
- Reviewed manifests for past 17 months.
- No sanitation permits required
- Drums of thinner, paint & oil are labeled.
- No treatment of waste done

I DECLARE THAT I HAVE EXAMINED AND RECEIVED A COPY OF THIS [1] PAGE INSPECTION REPORT.

PRINT NAME & TITLE: TJ Boehm Mgr. Env. Affairs

SIGNATURE: [signature] DATE: 4 / 6 / 90

5/8'd 09:04AM COUNTY OF ORANGE

Attachment # 2

United States Environmental Protection Agency
Region 9
75 Hawthorne Street, (WST-6)
San Francisco, CA 94105

December 30, 1999

Ms Theresa Boehm, Env Eng
The Boeing Co
2201 Seal Beach Blvd S E 99
Seal Beach, CA 90740-8250

The US Environmental Protection Agency (EPA) has updated the information for your installation under the EPA Identification (ID) number already assigned to your location (see below). EPA has updated this ID number in response to the Notification of Regulated Waste Activity Form (Form 8700-12) received from your installation on December 30, 1999.

By submitting the Form 8700-12, your installation has notified EPA of the Resource Conservation and Recovery Act (RCRA) regulated waste activities shown below in accordance with Section 3010 of RCRA. The EPA ID number for this location is also referred to as a 'RCRA ID number' and is to be used on transport manifests and any other hazardous waste management documents required under Subtitle C of RCRA.

RCRA ID number: CAD057782989
assigned to: The Boeing Co
2201 Seal Beach Blvd
Seal Beach, CA 90740-8250

EPA has listed your status as:

Small Quantity Generator

For assistance with questions regarding RCRA regulations, call the National RCRA Hotline at (800) 424-9346. For assistance with any other questions, or if you need to obtain a current version of the EPA Notification of Regulated Waste Activity Form (Form 8700-12) please contact:

U.S. EPA Region 9
RCRA Notifications
75 Hawthorne Street
(WST-6/Tetra Tech)
San Francisco, CA 94105
Phone: (415) 495-8895

SEAL BEACH TRAINING DIRECTIVES

* Certification O Familiarization O Qualification

Course Number	521008
Course Title	Hazardous Waste Management
Course Authorized By	In accordance with Administrative Procedure 1-02:
Course Description	Identify hazardous waste materials, the labeling requirements, handling, storage, transportation and final disposal of such materials necessary to satisfy the Federal Code of Regulations, Title 40 and 49.
Prerequisite Course	521010 Hazard Communications
Prerequisite Medical	None
Other	None
Course Length	~~3~~ 2 Hours 2 hrs. Doesn't show video tape
Certification Period	12 Months

SEAL BEACH TRAINING DIRECTIVES

* Certification O Familiarization O Qualification

Course Number	521010
Course Title	Hazard Communications
Course Authorized By	In accordance with Administrative Procedure 1-02:
Course Description	A general knowledge of the hazards associated with the use of chemicals and reagents through inhalation, absorption and ingestion and obtaining Material Safety Data sheets (MSDS) for specific chemicals that may be found in the individuals work area and the knowledge to understand the information contained on the MSDS.
Prerequisite Course	None
Prerequisite Medical	None
Other	None
Course Length	~~1 Hour~~ 2 hrs.
Certification Period	

Dept	Last Name	First Name	Job Description	Class Description	Last Date
189	Thompson	Robert, E.	Janitor	521008/10 Waste Mgt/Haz-	5/22/00
189	Hathaway	Dean	Electrician	521008/10 Waste Mgt/Haz-	5/22/00
189	Cardones	Noel	Maint. Eng. Spec.	521008/10 Waste Mgt/Haz-	5/22/00
189	Lalicker	Manuel	Carpenter	521008/10 Waste Mgt/Haz-	5/22/00
189	Garcia 1	Edward	Electronic Electrician	521008/10 Waste Mgt/Haz-	5/22/00
189	Jones 2	Kenneth	Maint. Engr. Lead	521008/10 Waste Mgt/Haz-	5/22/00
189	McPhail	Hugh	Electrician	521008/10 Waste Mgt/Haz-	5/22/00
189	Jones	Barbara	Dept. Secretary	521008/10 Waste Mgt/Haz-	5/22/00
189	Westover	Stanley	Electrician	521008/10 Waste Mgt/Haz-	5/22/00
189	Claussel	Ted	Janitor	521008/10 Waste Mgt/Haz-	5/22/00
189	Pesquera	Barbara	Janitor	521008/10 Waste Mgt/Haz-	5/22/00
189	Balucanag	Manny	Special Assignment	521008/10 Waste Mgt/Haz-	5/22/00
189	Shaddock	Sharon	Work Control Clerk	521008/10 Waste Mgt/Haz-	5/22/00
189	Munns	Daniel	Carpenter	521008/10 Waste Mgt/Haz-	5/22/00
189	Nau	Frank	Carpenter	521008/10 Waste Mgt/Haz-	5/22/00
189	Tenace	Ronald	Maint. Mechanic	521008/10 Waste Mgt/Haz-	5/22/00
189	Westover	Stephen	Electrician	521008/10 Waste Mgt/Haz-	4/10/00
189	Baker	Drew	Janitor	521008/10 Waste Mgt/Haz-	4/10/00
189	Howze	Mark	A/C Mechanic	521008/10 Waste Mgt/Haz-	4/10/00
189	Langit	Abraham	A/C Mechanic	521008/10 Waste Mgt/Haz-	4/10/00
189	Langsdorf	Robert	Electrician	521008/10 Waste Mgt/Haz-	4/10/00
189	Gibson	Earl, M.	Janitor	521008/10 Waste Mgt/Haz-	4/10/00
189	Bereal	Joseph	Janitor	521008/10 Waste Mgt/Haz-	4/10/00
189	Baxter	Clevon V.	Electrician	521008/10 Waste Mgt/Haz-	4/10/00
189	Pina	Joe	Janitor	521008/10 Waste Mgt/Haz-	4/10/00
189	Wilder	William	Janitor	521008/10 Waste Mgt/Haz-	4/10/00
189	Black	Larry	Material Handler	521008/10 Waste Mgt/Haz-	4/10/00
189	Wilkison	Jerry	Electrician	521008/10 Waste Mgt/Haz-	4/10/00
189	Tabisola	Manuel	Janitor	521008/10 Waste Mgt/Haz-	4/10/00
189	Costello	John	Janitor	521008/10 Waste Mgt/Haz-	4/10/00
189	Souza	Herb	Janitor	521008/10 Waste Mgt/Haz-	4/10/00
189	Stevenson	Bob	Painter	521008/10 Waste Mgt/Haz-	10/14/99
189	Montague	Don	Painter	521008/10 Waste Mgt/Haz-	10/14/99
189	Shields	Lawrence	Dept. Manager	521008/10 Waste Mgt/Haz-	10/14/99
189	Mote	Russell	Supervisor	521008/10 Waste Mgt/Haz-	7/29/99
189	Holt	Wayne	Staff Analyst, Sr.	521008/10 Waste Mgt/Haz-	7/29/99
189	McClendon	Cardell	Supervisor	521008/10 Waste Mgt/Haz-	7/29/99
189	Apt	Kenneth	Janitor	521008/10 Waste Mgt/Haz-	7/29/99
189	Hernandez 1	Albert	A/C Mechanic	521008/10 Waste Mgt/Haz-	7/28/99
186	Baddley	Mike	Manager, Sr.	521008/10 Waste Mgt/Haz-	7/28/99
189	Donald	Dale	Supervisor	521008/10 Waste Mgt/Haz-	7/28/99
189	McLeod	Bobby	Janitor	521008/10 Waste Mgt/Haz-	7/28/99
189	Christensen	Inge	Janitor	521008/10 Waste Mgt/Haz-	7/22/99
189	Burnett	Johnnie	Material Handler	521008/10 Waste Mgt/Haz-	7/22/99
189	Bennett 1	Bobby	Janitor	521008/10 Waste Mgt/Haz-	7/22/99
189	Neal	Andy	Janitor	521008/10 Waste Mgt/Haz-	7/22/99

Courses outline for
Hazardous Waste Management
521008

SSD SEAL BEACH
Training and Development
Rev. 05/08/95

I. Introduction

A. Course
B. Instructor
C Purpose of this training

II. Course overview

A. Types of environmental pollution

B. Why we care about the environment

C What we can do to prevent/eliminate/minimize environmental pollution

D What to do in case of an accidental release of hazardous materials

III. Types of environmental pollution

A. Air (south coast air quality management district) AQMD

1. Criteria pollutants ("smog")

2. Air toxins

3. Ozone-depleting compounds

4. Greenhouse effect (carbon dioxide)

5. Acid rain

B. Surface water

1. Storm drains
2. Sewers

C Ground water

D Soil

*** Show diagram of link between air, water, and soil pollution.

IV. Why do we care about environmental pollution

A. Human health

1. Employees and their families

2. Surrounding communities

B. Animal/plant health

1. Preserve the ecosystem

2. Indirect link to human health through the food chain

C. Deterioration of inanimate objects

D. Government regulations

V. Types of pollution generated by Seal Beach facility

A. Air

1. Mobile sources (vehicles)

2. Stationary sources (boilers, degreasers, spray booths etc.)

B. Water

1. Runoff into storm drains

2. Sewers (manufacturing processes)

C. Soil

1. Leaking underground storage tanks

2. Illegal dumping in the past

3. Particle deposition on soil

4. Spills

D. Hazardous waste

1. Overview of the Regulations

The Resource Conservation and Recovery Act (RCRA) signed into law in 1976

Adminstristrative Procedure 3-15

2. Defining Hazardous Waste

Hazardous waste is waste material listed in the federal or state regulation as a hazardous waste, or waste material that possesses one or a combination of the following characteristics:

- Ignitable - a flash point below 140 F, can catch fire easily
- Corrosive - acid (ph≤2) or caustic (ph≥12.5), can cause tissue damage
- Reactive - can explode or release toxic gases on contact with air, water, or other hazardous material
- Toxic - harmful to humans or animals

NOTE: Discuss the importance of insuring that a Material Safety Data Sheet (MSDS) is availiable for all hazardous materials

.....insert chart showing typical waste streams and volumes

VI. What can we do to prevent/eliminate/minimize environmental pollution

A Environmental compliance

1. Housekeeping
2. Record keeping
3. Hazardous material/hazardous waste handling

B. Prevent or eliminate pollution/Minimize waste

1. Material substitutions

2. Process changes

3. Equipment retrofit/replacement

4. Recycle/recover product for reuse

VII. Environmental Compliance

A. Housekeeping

1. Keep containers of products containing solvents, coatings, ozone-depleting compounds, and toxins tightly closed at all times

2. Deposit trash coated with solvents, coatings, ozone-depleting compounds, and toxins in covered trash receptacles

B. Stormwater runoff

1. Keep areas clean of materials that could contaminate storm water runoff

2. Spill prevention

a. Be careful
b. Use drip pans
c. Correct any leaks
d. Relocate industrial equipment indoors

C. Record keeping

1. Accurate

2. Complete

3. Daily

D. Hazardous materials

1. Store containers that are compatible with the hazardous materials

2. Segregate containers of hazardous materials by characteristics

   a. Corrosive
   b. Reactive
   c. Flammable
   d. Toxic

3. Be familiar with hazardous characteristics before use

4. Dispose of hazardous materials in accordance with characteristics and applicable regulations

D. Hazardous waste storage requirements

1. Hazardous wastes must be kept in:

   a. Approved drums provided by facilities

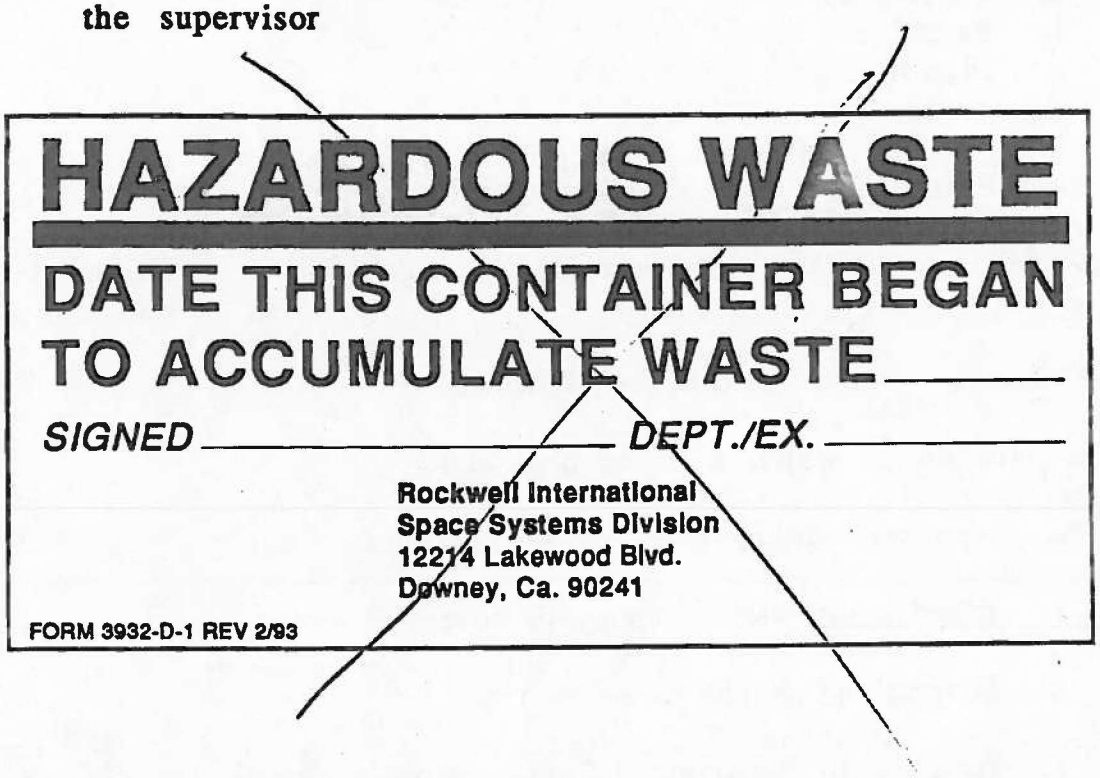
   b. Diked areas with a canopy or cover

   c. Fenced and locked area

   d. Areas with emergency phone, eyewash/shower, and fire extinguishers/sprinklers

2. Using departments must designate one supervisor and area monitor for the disposal of all hazardous wastes in that area. They will be responsible for controlling all material entering or leaving the hazardous waste storage area by:

a. Placing a waste accumulation sticker on a drum signed and dated by the supervisor



b. Filling out a waste deposition log including the:

1) Date

2) Type of waste

3) Amount in gallons

4) Who placed them there

5) What kind of hazards they present

Rockwell International

WASTE DEPOSITION LOG

DATE	TYPE OF WASTE (NAME)	AMOUNT (NO. GALS.)	DEPOSITED BY	HAZARDOUS PROPERTIES* (N=none,T=Toxic,F=Flammable,C=Corrosive)

3. Chemicals placed in drums must be compatible. Call safety if you are not sure

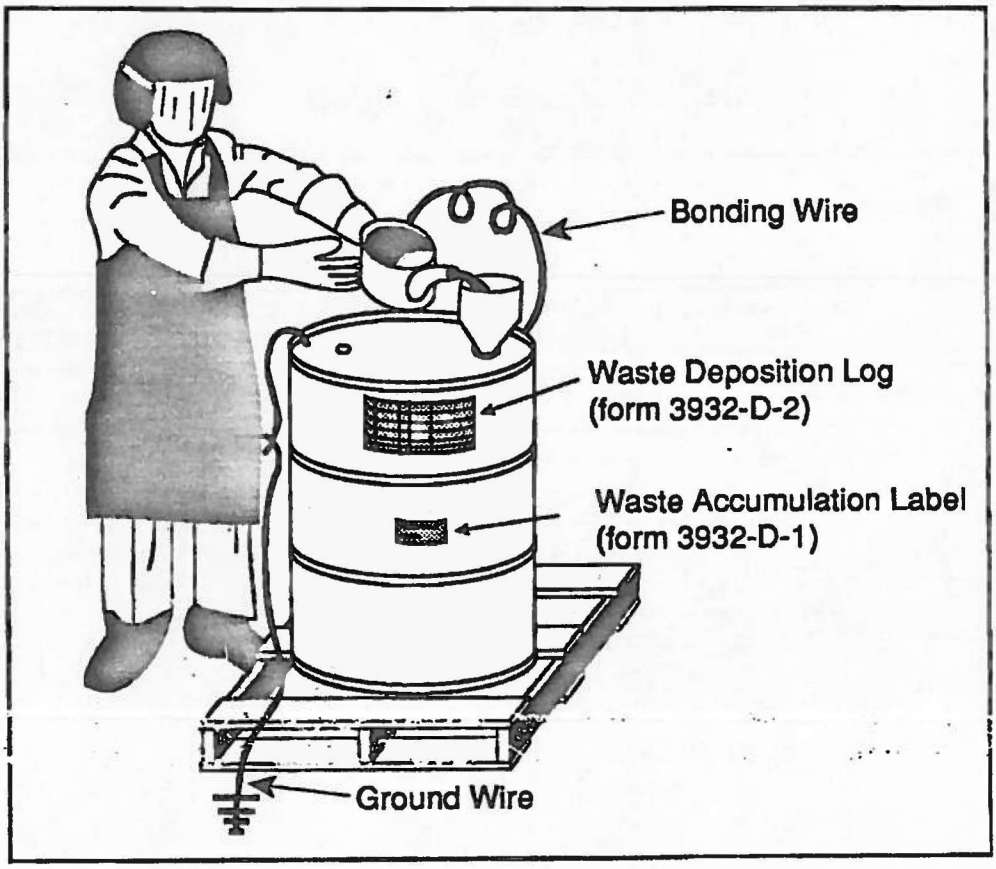
4. Make sure drums are closed except during use

5. Remove funnels when not in use

6. Make sure drums are not damaged

7. All drums are to be palletted

8. Drums with flammables must be grounded



9. While working around hazardous wastes always use safety approved protective clothing such as:

   a. Gloves

   b. Facemasks

c. Goggles

d. Apron

e. Respirator (if trained by safety dept.

10. Inspect hazardous waste containers weekly for detection of any leaks and deteriorations that may lessen the structural integrity of the drum. Completes and maintains copy of the Hazardous Waste Container Log (Form 3933-D-6)

E. What type of hazardous waste does SSD generate

1. Oil, Acids, caustics, solvents, flammable liquids, asbestos, cool tower sludge, chemical containers and expired material, Fluorescent light bulbs, batteries, Empty used drums, experimental waste, sump water, PCB light ballast.

F. Hazardous Waste Disposal Requirements

1. Remove Hazardous Waste from the generating departing within 45 days after accumulation has started.

2. Check Waste accumulation label

3. Fill out routing ticket

4. Palletize and band drum

5. Foward waste to Main Storage area for subsequent disposal by an approved Hazardous Waste Disposal Firm

NOTE: The law only allows 90 day storage of Hazardous Waste without a permit. Contact the Environmental Group (x0869 or 2042) for assistance

G. Inspect hazardous waste containers weekly for detection of any leaks and deteriorations that may lessen the structural integrity of the drum. Completes and maintain copy of the Hazardous Waste Container Inspection Log, (Form 3932-D-6) and replaces the drum, as necessary.

H. Hazardous waste handling and disposal costs for 1993

Disposal cost:	$ 228,850
Additional labor costs:	$ 24,990
Abatement Labor:	$ 361,100
Additional maintenance labor:	$ 25,946
Spill cleanup labor costs	$ 22,743
Grand total	**$ 663,629**

H. 1993 Hazardous waste data

Waste Category	Tons	Cost
Asbestos	196.35	$65,430
Light Ballast's	2.04	$7,996
Chemical; processing	11.22	$18,190
Graphics waste	6	$19,745
Incineration	2.32	$12,270
Laboratory	2.57	$18,205
Maintenance waste	42.35	$40,497
Manufacturing waste	1.87	$5,630
Oil	8.8	$8,985
Paint waste	1.19	$2,859
Spills	14.32	$8,517
Sump clean outs	68.66	$20,520
Totals:	**359.70**	**$228,850**

I. Examples of pollution prevention/waste minimization at Downey facility

1. Recycle and recover chlorofluorocarbons (ozone-depleting substances) used in air conditioning units, which if released, contribute to the depletion of the ozone layer.

2. Retrofit boilers with "low-NOx" burners which are more efficient and emit significantly less nitrogen oxides into the air.

3. Install silver recovery units on photo processing machines to capture residual silver from photo processing machines waste water before it can enter the sewer.

4. Replace spray booth filters and wet scrubber packing with upgraded materials to capture hexavalent chromium emissions, and minimize surface coating tank agitation time to decrease hexavalent chromium emissions before they reach the scrubber

5. Upgrade coatings spray guns to HVLP (high volume-low pressure) guns which increase the transfer efficiency of coatings, resulting in lower emissions of volatile organic and toxic compounds, and less hazardous waste to be disposed of.

6. Replace surface coating baths containing hexavalent chromium and ozone-depleting compounds with more environmental friendly processes.

VIII. Hazardous Waste Emergency Plan

A. Report all accidental releases of hazardous materials immediately

1. Notify your management

2. Notify protective services and provide the following information

a. Location of the release (grid, building, floor)
b. Substance (s) released
c. Approximate amount released
d. Source of release
e. Information regarding persons exposed to and/or injured by the release

B. Turn off the source of the release if it is safe to do so

C Secure the area

1. Prevent unauthorized persons from entering

2. Leave the area, staying upwind of the release

3. Authorized personnel includes Security, Environmental, Safety and their appointed representatives

D. Never attempt to:

1. Clean up a large spill

2. Assist a person who has been exposed to an accidental release and/or injured as a result of the release

IX. Hazardous Management Do's and Don'ts

A. Do's

1. Establish a purchasing control program that identifies time-sensitive chemicals that consistently show up in the waste stream

   a. In time-sensitive chemicals, excess becomes WASTE

2. Physically separate containers of incompatible waste substances to avoid accidental mixing and the health hazards associated with that possibility

3. Be aware of the resale potential

   a. Identification and purity are factors that affect this potential

B. Don'ts

1. Don't mix different classes of hazardous waste in the same container

   a. This creates unknowns (as they are referred to in the chemistry world) with unpredictable chemical reactions that may be dangerous or life threatening

   b. It also makes them difficult to near impossible to dispose of and many times more expensive

2. Don't ship/store hazardous waste in non-approved containers

3. Don't mis-identify hazardous waste

   a. Mis-identification could result in personal injury or death.

1. The guy downstream in the disposal chain depends on your information to determine the proper handling of the waste